

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 2:20-mj-30432

v.

HONORABLE

D-1 SAMEERAH MARRELL, aka
“SAMEERAH ANDERSON,” aka
“SAMEERAH PICKETT,” aka “CRÈME,”
aka “LAUREN BOYD,”

Defendant.

/

**STIPULATION FOR A PROTECTIVE ORDER REGARDING
PRODUCTION OF TAX, FINANCIAL, AND/OR BANKING RECORDS**

The United States of America, by its undersigned attorneys, and D-1 SAMEERAH MARRELL, by her counsel, Steven Fishman, hereby stipulate to the entry of a Protective Order with respect to the production of financial/banking records, account numbers, personal checks, identification documents, tax records, and various means of identification and telecommunications information in this criminal proceeding [“Protected Information”].

1. The complaint in this case alleges the offenses of False Claims Conspiracy, False Claims against the United States, and Aggravated Identity Theft arising from a scheme to fraudulently obtain money from the United States by filing false income tax returns for trusts and estates, in some cases using the personal identification information (PII) of persons without their knowledge or consent;
2. During the course of the underlying investigation, the United States obtained financial and banking records, identification records, business records, and tax records from various sources, as well as electronic records pertaining to ISP addresses, subscriber information and electronic filing information. All of these types of records include numerous documents which contain social security numbers, driver license/state identification numbers, taxpayer identification numbers, dates of birth, financial accounts and account numbers, home addresses and other personal identification information [collectively, “PII”] that may relate to both parties and non-parties.

THEREFORE, the parties stipulate and agree to the following:

1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority.
2. This order pertains to all discovery provided to or made available to defense counsel as part of discovery in this matter.
3. By signing this Stipulation and Protective Order, defense counsel agrees not to share any documents that contain Protected Information with anyone other than defense counsel, designated defense investigators, support staff, or any other individuals necessary for assisting the defense in the preparation and trial of this matter. Defense counsel may permit the defendant to view unredacted documents. The parties agree that defense counsel, defense investigators, and support staff shall not allow the defendant to copy and/or retain Protected Information contained in the discovery. Under no circumstances may the defendant retain copies of any documents tendered by the government as discovery in this case which contains any PII outside the presence of the defense counsel or other member of the defense team.

4. The discovery and information therein may only be used in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the United States Government. Defense counsel will return the electronic discovery to the Government at the conclusion of this case and make reasonable efforts to permanently delete any copies from their computer systems. Defense counsel may, in lieu of returning the electronic discovery to the Government at the conclusion of the case, destroy the electronic discovery by shredding the media on which it was furnished such that the data may never be accessed, and certify to the government, in writing, that the evidence has been so destroyed. If any defense counsel, defense investigator, or support staff has produced hard copies of the discovery, the hard copies shall be shredded. Within 90 days following the conclusion of the litigation in this matter, defense counsel shall certify in writing to counsel for the United States that all of the discovery documents have been returned, destroyed and/or shredded.

5. In the event the defense seeks utilization of the discovery material in any court filing, at trial or in another hearing in this matter, any Protected Information must be redacted from the discovery prior to its use. Any filings shall be filed in compliance with Rule 49.1 of the Federal Rules of Criminal Procedure and the Electronic Filing Policies and procedures of the United States District Court for the Eastern District of Michigan.
6. Defense counsel shall be responsible for advising his respective defendant, employees, and other members of the defense team of the contents of this Stipulation and Protective Order. Any unauthorized disclosure may constitute a violation of this Court's order.
7. In the event that the defendant substitutes counsel, undersigned defense counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this order.

WHEREFORE, for all the foregoing reasons, the parties respectfully request

that this Court enter a Protective Order allowing the government to produce unredacted copies of banking and/or financial records and any other records relevant to this case containing Protected Information to defendant, through his counsel of record in this proceeding, and restricting the use of the documents and information as provided above.

So stipulated and respectfully submitted,

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Date: May 20, 2021

IT IS SO ORDERED.

s/R. Steven Whalen
R. Steven Whalen
United States Magistrate Judge

Dated: May 24, 2021